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Counsel for Jaco Electronics, Inc.

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA – SAN FRANCISCO DIVISION**

16 *Jaco Electronics, Inc. v. Hynix Semiconductor, Inc., et al.* (Case No. C06-01212 PJH) ) Case No. C 07-01212 PJH  
17

**STIPULATION AND  
[PROPOSED] ORDER  
BETWEEN PLAINTIFF AND  
MICRON DEFENDANTS  
EXTENDING DATE TO FILE  
MOTIONS TO COMPEL  
DISCOVERY**

## **STIPULATION**

2                   This Stipulation is entered into between Plaintiff and Defendants Micron  
3 Technology, Inc. and Micron Semiconductor Products, Inc. (collectively, "Micron") in the *Jaco*  
4 action, and is made with regard to the following facts:

5 WHEREAS, the deadline for completion of fact discovery in the above captioned actions  
6 was December 17, 2007;

7 WHEREAS, discovery responses timely served on or about December 17, 2007, have  
8 given rise to discovery disputes;

9 WHEREAS, Plaintiff and Micron filed a stipulation and proposed order with this Court  
10 on December 27, 2007, seeking an extension until January 18, 2008, for Micron to move to  
11 compel further discovery responses from Plaintiff in the event the parties were unable to resolve  
12 the disputes among themselves;

13 WHEREAS, this Court entered the stipulated order on January 4, 2008;

14 WHEREAS, Plaintiff and Micron filed a stipulation and proposed order with this Court  
15 on January 17, 2008, seeking another extension until January 25, 2008, for Micron to move to  
16 compel further discovery responses from Plaintiff in the event the parties were unable to resolve  
17 the disputes among themselves;

18 WHEREAS, Plaintiff and Micron, upon an oral motion at a hearing before this Court on  
19 January 25, 2008, jointly sought another extension until February 8, 2008, for Micron to move to  
20 compel further discovery responses from Plaintiff, and this Court granted that extension from the  
21 bench;

22 WHEREAS, per this Court's request, Plaintiff and Micron memorialized this Court's  
23 ruling from the bench in a joint letter filed with the Court on January 30, 2008 (Document  
24 Number 177); and

25 WHEREAS, Plaintiff has agreed to supplement its responses by February 29, 2008, to  
26 Interrogatory Nos. 1, 2 and 11 of Micron's First Set of Interrogatories and Request for  
27 Admission Number 5 of Micron's First Set of Requests for Admission served on November 14,  
28 2007;

1 NOW THEREFORE, PLAINTIFF AND MICRON, THROUGH THEIR  
2 RESPECTIVE COUNSEL, HEREBY STIPULATE to the Court entering the attached Proposed  
3 Order.

4 DATED: February 20, 2008 CROWELL & MORING LLP

5 */s/ David D. Cross*

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13 *Counsel for Plaintiff*  
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15 DATED: February 20, 2008 GIBSON, DUNN & CRUTCHER LLP

16 */s/ Joshua Hess*  
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22 *Counsel for Defendants*  
23 *Micron Technology, Inc. and Micron Semiconductor*  
24 *Products, Inc.*

25 I hereby attest that I will maintain on file all holograph signatures for any  
26 signatures indicated by a "conformed" signature (/S/) within this e-filed document.

27 */s/ David D. Cross*

**[PROPOSED] ORDER**

The Court hereby ORDERS:

That Plaintiff and the Micron Defendants shall have until March 14, 2008, to file motions to compel with respect to fact discovery disputes regarding Plaintiff's responses to discovery requests served by Micron on November 14, 2007, that are then still outstanding and that were raised in meet and confer communications on December 27, 2007.

## IT IS SO ORDERED.

Dated: 2/29/08

